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*Attorneys for Plaintiffs*  
*And the Proposed Class and Subclasses*

21 UNITED STATES DISTRICT COURT  
22 NORTHERN DISTRICT OF CALIFORNIA  
23 SAN FRANCISCO DIVISION

24 AYANA STEVENSON and  
25 DAVID AMBROSE,  
26 For Themselves,  
27 As Private Attorneys General, and  
28 On Behalf Of All Others Similarly  
Situating,

Plaintiffs,

v.

SIRIUS XM RADIO INC.,  
Defendant.

Case No. 3:23-cv-2367

**JOINT STIPULATION AND  
[PROPOSED] ORDER FOR  
ENLARGEMENT OF TIME TO  
FILE AMENDED COMPLAINT  
AND RESPONSE TO THE  
COMPLAINT**

Judge: Thomas S. Hixson

**STIPULATION**

Plaintiffs Ayana Stevenson and David Ambrose (“Plaintiffs”) and Defendant Sirius XM Radio Inc. (“SiriusXM”) file this joint stipulation under Civil Local Rules 6-1(b) and 6-2 agreeing to an enlargement of time for amendment of the pleadings and response to the complaint, and state as follows:

1. On April 14, 2023, Plaintiffs filed a Complaint in Contra Costa County against SiriusXM. Plaintiffs have not served SiriusXM with the summons and complaint.

2. On May 15, 2023, SiriusXM removed this action to the Northern District of California.

3. Under Federal Rules of Civil Procedure 81(c)(2), the current deadline for SiriusXM to respond to the Complaint is June 5, 2023.

4. Plaintiffs intend to file an amended complaint.

5. The parties stipulate and agree that Plaintiffs shall have until June 19, 2023 to file an amended complaint.

6. The parties further stipulate and agree that SiriusXM shall have until July 17, 2023 to move, answer, or otherwise respond to the complaint then on-file.

7. This is the first request for an extension of time by the either party in this action.

8. This requested extension of time will not have any effect on any other deadlines set by the Court.

1 Dated: May 23, 2023

JONES DAY

2  
3 By: /s/ Diana L. Calla

4 Diana L. Calla

5 Lee A. Armstrong

Eric P. Stephens

6 Attorneys for Defendant  
7 Sirius XM Radio Inc.

8 Dated: May 23, 2023

HATTIS & LUKACS

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10 By: /s/ Daniel M. Hattis

11 Daniel M. Hattis

12 Attorneys for Plaintiffs  
13 And the Proposed Class and Subclasses  
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**LOCAL RULE 5-1 ATTESTATION**

In accordance with Civil Local Rule 5-1(h)(3), I attest that the above signatories concur in the contents of this document and have authorized its filing.

Dated: May 23, 2023

/s/ Diana L. Calla

Diana L. Calla

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE THOMAS S. HIXSON  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2023, I authorized the electronic filing of the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the email addresses on the Electronic Mail Notice List. I further certify that I served a copy of this filing on counsel for Plaintiffs via email at dan@hattislaw.com and pkl@hattislaw.com.

/s/ Diana L. Calla  
Diana L. Calla